

# BLANK ROME COMISKY & McCAULEY LLP

*Counselors at Law*

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*Delaware  
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Ohio  
Pennsylvania  
Washington, DC*

July 15, 2002

**Via Hand Delivery**

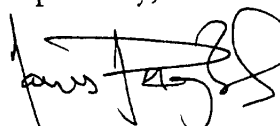
Judge James T. Giles  
US District Court for the  
Eastern District of Pennsylvania  
US Courthouse, Room 17614  
601 Market Street  
Philadelphia, Pennsylvania 19106

***Re: LAUGHLIN PRODUCTS, INC., Plaintiff, vs.  
HOLLYWOOD TANS, INC., DOLLY  
MCSHAIN, and BOB JOHNSON, Defendants  
Civil Action No. 02-CV-4061***

Dear Judge Giles:

Enclosed is Defendants Uncontested Motion for Enlargement of Time to Respond to Complaint in the above captioned matter, which was filed with the Clerk of Court today. Please note that our appearance in this matter is for the limited purpose of obtaining an extension of time to respond.

Respectfully,

  
James J. Reynolds

JJR:cas  
Enclosure  
cc: Michael A. O'Neil, Esquire

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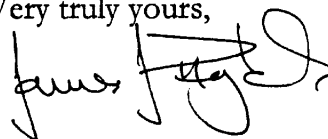
Michael E. Kunz  
Clerk of the District Court  
US District Court for the  
Eastern District of Pennsylvania  
US Courthouse, Room 2609  
601 Market Street  
Philadelphia, Pennsylvania 19106

***Re: LAUGHLIN PRODUCTS, INC., Plaintiff, vs.  
HOLLYWOOD TANS, INC., DOLLY  
MCSHAIN, and BOB JOHNSON, Defendants  
Civil Action No. 02-CV-4061***

Dear Mr. Kunz:

Enclosed for filing is an original and one copy of Defendants' Uncontested Motion for Enlargement of Time to Respond to Complaint in the above captioned matter. Please note that our appearance in this matter is for the limited purpose of obtaining an extension of time to respond.

Very truly yours,



James J. Reynolds

JJR:cas  
Enclosures  
cc: Michael A. O'Neil, Esquire

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

_____	:	Civil Action No. 02-CV-4061
LAUGHLIN PRODUCTS, INC.,	:	
	:	
Plaintiff,	:	Judge James T. Giles
	:	
vs.	:	
	:	
HOLLYWOOD TANS, INC., DOLLY	:	
MCSHAIN, and BOB JOHNSON,	:	
	:	
Defendants.	:	
_____	:	

**ORDER GRANTING DEFENDANTS' UNCONTESTED MOTION FOR  
ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT**

Upon consideration of Defendants' Uncontested Motion For Enlargement Of Time To Respond to Complaint it is hereby ORDERED that Defendants' Motion is granted. Defendants shall have through and including August 29, 2002 within which to file a response to Plaintiff's Complaint.

\_\_\_\_\_  
James T. Giles, Chief Judge

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LAUGHLIN PRODUCTS, INC.,	:	Civil Action No. 02-CV-4061
	:	
Plaintiff,	:	Judge James T. Giles
	:	
vs.	:	
	:	
HOLLYWOOD TANS, INC., DOLLY	:	
MCSHAIN, and BOB JOHNSON,	:	
	:	
Defendants.	:	

**DEFENDANTS' UNCONTESTED MOTION FOR  
ENLARGEMENT OF TIME TO RESPOND TO COMPLAINT**

Defendants, Hollywood Tans, Inc., Dolly McShain and Bob Johnson, by and through their undersigned attorneys, file this unopposed Motion for Enlargement of Time to Respond to Plaintiff's Complaint, and as grounds therefore state as follows:

1. Defendants were served with the Summons and Complaint in this matter on June 25, 2002. Under the Rules, their response is due by July 15, 2002 (20 days after service).
2. The undersigned attorneys have only recently been retained by Defendants to represent them in this matter and have not yet had a sufficient opportunity to review the Complaint, confer with Defendants and prepare an appropriate response.
3. Defendants request an enlargement of time, through and including August 29, 2002, within which to respond to Plaintiff's Complaint.
4. Defendants' attorneys have conferred with Plaintiff's counsel, Michael A. O'Neil, Esq., who has indicated that he consents to the relief sought herein.
5. Pursuant to Local Rule 7.1, no memorandum of law accompanies this Motion

WHEREFORE, Defendants respectfully requests an enlargement of time, through and including August 29, 2002, within which to file a response to Plaintiff's Complaint.

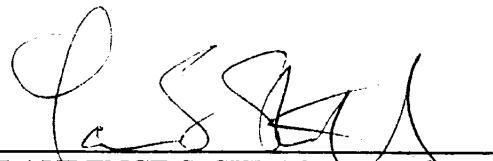
Respectfully submitted,

By: 

\_\_\_\_\_  
Laurence S. Shtasel, Esq.  
BLANK ROME COMISKY & McCAULEY LLP  
1 Logan Square  
Philadelphia, PA 19103  
(215) 569-5691  
(215) 832-5691 (Fax)

**CERTIFICATE OF COUNSEL**

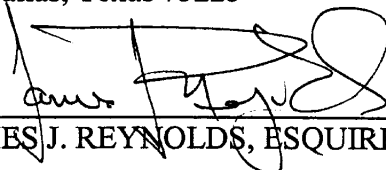
I, Laurence S. Shtasel, hereby certify that, pursuant to Local Rule 7.1(b), Defendants' Motion for Enlargement of Time is uncontested.

  
LAURENCE S. SHTASEL, ESQUIRE

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by regular U.S. Mail this 15 day of July, 2002 to:

Michael A. O'Neil, Esquire  
5949 Sherry Lane  
Suite 1030, Dallas, Texas 75225

  
\_\_\_\_\_  
JAMES J. REYNOLDS, ESQUIRE